

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

QUINSTREET, INC.,	)	
	)	
Plaintiff,	)	
	)	C.A. No. 06-495-SLR
v.	)	
	)	
PARALLEL NETWORKS, LLC,	)	
	)	
Defendant.	)	

**30(b)(6) NOTICE OF DEPOSITION OF QUINSTREET, INC.**

PLEASE TAKE NOTICE that pursuant to the Federal Rule of Civil Procedure 30(b)(6), Defendant Parallel Networks, LLC ("Parallel Networks") shall take the deposition by oral examination of Plaintiff QuinStreet, Inc. ("QuinStreet") through one or more of QuinStreet's officers, directors, agents or other representatives who shall be designated to testify on its behalf regarding all information known or reasonably available to QuinStreet with respect to the subject matters identified in **Exhibit A**.

The deposition shall commence at 9:00 a.m. on January 17, 2008 at the Chicago offices of Jenner & Block, and shall continue thereafter until adjournment. The deposition shall be taken before a duly certified court reporter and notary public. Pursuant to Federal Rule of Civil Procedure 30(b)(2), testimony of the witness(es) will be recorded by stenographic, sound and/or visual means.

QuinStreet is requested to provide Parallel Networks' counsel, on or before January 10, 2008, written notice of the name and position of each person designated to testify on behalf of QuinStreet. To the extent that more than one deponent is identified, QuinStreet shall state in advance of the deposition which topic(s) identified in **Exhibit A** each deponent is prepared to address.

Counsel for QuinStreet is invited to attend the deposition and to cross-examine.

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Dated: January 8, 2008  
841414 / 31393

*Attorneys for Defendant  
Parallel Networks, LLC*

**Exhibit A**

QuinStreet's corporate representative(s) shall be prepared to testify regarding the following topics, all with respect to QuinStreet's production of documents:

1. All steps taken by or on behalf of QuinStreet in response to discovery requests from Parallel Networks and/or epicRealm Licensing.
2. The process undertaken by QuinStreet to identify, review and produce documents to Parallel Networks including, for example, who was involved in the process, where were searches performed, whose documents were searched, what files were searched, keyword searches of electronic documents, computers searched, and how the documents were reviewed for attorney-client privilege, work-product and/or confidentiality.
3. The process undertaken by QuinStreet to identify, review and produce source code to Parallel Networks including, for example, identifying which documents QuinStreet considers to be source code and the volume of and location of source code that has not or cannot be produced by QuinStreet.
4. Identities of all current and former personnel, counsel or vendors involved in the processing of any QuinStreet documents for production to Parallel Networks or epicRealm Licensing, including, for example, those persons who labeled the documents, reviewed them for confidentiality, privilege, and/or work product, and/or determined the manner in which they were produced to Parallel Networks.
5. QuinStreet's actions taken to ensure that its document production complies with Judge Robinson's Standing Order on electronic discovery.
6. How to search the hard drives and disks produced by QuinStreet, including, for example, how to locate the search terms used by QuinStreet to identify documents for production within those hard drives and disks.
7. The identity of the software platforms associated with the four servers produced by QuinStreet, including, for example, how to determine which software configuration (*i.e.* Apache Standalone, Apache Tomcat, Apache Weblogic, Microsoft IIS, or Microsoft IIS with JRun) is run on the server files produced by QuinStreet.
8. The format of electronic documents produced by QuinStreet and the structure and format of QuinStreet's electronic mail systems and document management systems.
9. QuinStreet's electronic records management policies and procedures.
10. QuinStreet's corporate procedures for complying with discovery requests, including, for example, the procedures for preserving relevant documents.

11. Identities of all current and former personnel of QuinStreet who are or were responsible, from 1999-present, for the ongoing operation, maintenance, expansion and upkeep of the networks, and for administering the electronic mail systems.
12. Identities of all current and former personnel of QuinStreet who are or were responsible, from 1999-present, for the maintenance of computer-generated records and the manner in which such records are organized and accessed.
13. Identities of all current and former personnel of QuinStreet who have or had access, from 1999-present, to network administration, backup, archiving, or other systems operations.

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**CERTIFICATE OF SERVICE**

I, David E. Moore, hereby certify that on January 8, 2008, the attached document was electronically filed with the Clerk of the Court using CM/ECF which will send notification to the registered attorney(s) of record that the document has been filed and is available for viewing and downloading.

I further certify that on January 8, 2008, I have Electronically Mailed the document to the following person(s):

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